The Honorable Diane DuBois, Chair  
Los Angeles County Metropolitan Transportation Authority (Metro)  
One Gateway Plaza  
Los Angeles, CA 90012-2952

June 10, 2014

RE: Comments on 2014 Metro Short Range Transportation Plan

Dear Chairwoman DuBois and Metro Directors:

The Natural Resources Defense Council (NRDC), ClimatePlan, and the Coalition for Clean Air respectfully submit our comments on Metro’s Short Range Transportation Plan (SRTP). We commend Metro for laying out a vision for the next ten years of transportation policy and investment that includes a strong commitment to expanding the transit network and promoting alternative transportation options. We acknowledge that determining priorities for the next decade is a difficult process informed by multiple factors, and there are limited resources to fund these projects. We have concerns, however, that the SRTP will not achieve enough greenhouse gas emissions (GHG) and vehicle miles traveled reductions to align with the Regional Sustainable Community Strategy (SCS) in the 2012 SCAG Regional Transportation Plan (RTP) as well as the Joint-Work Program adopted by Metro and SCAG to implement the SCS. We are also troubled by the inadequate investments in active transportation, shared use mobility and other alternative transportation options that can get more L.A. County residents to drive less.

With over 1.4 million members and online activists joining more than 350 lawyers, scientists, and other professionals, the NRDC works to tackle the biggest environmental issues we face today. ClimatePlan, a network of over forty non-profit organizations, is committed to improving land use and transportation planning throughout California to protect our communities, health, and environment. And Coalition for Clean Air (CCA) is a statewide organization exclusively dedicated to improving air quality in California by advocating for effective public policy and practical business solutions. One of the most pressing environmental issues for California is our efforts to reduce greenhouse gas emissions and preserve our state for future generations. Reducing traffic is critical to reducing emissions. We must invest in improvements in mobility choice, sustainability, and air quality to reduce traffic congestion and ultimately GHG emissions.

**Align the SRTP with the 2012 RTP/SCS and Joint-Work Program**

Our local and regional plans must reflect this urgency and call for changes to land use, housing and transportation patterns so we can meet the goals set out by SB 375 and implement the 2012 Sustainable Communities Strategy. NRDC, ClimatePlan, and Coalition for Clean Air worked with a variety of partners and local elected officials to develop an ambitious yet achievable RTP/SCS in Southern California. By spending nearly half the plan’s revenue on transit and increasing bike/pedestrian funding by 350 percent, the 2012 RTP/SCS reduces GHG emissions by 9 percent in 2020 and by 16 percent in 2035. To ensure these GHG reduction targets are met, it is critical that Metro and SCAG work together. The
Metro-SCAG RTP/SCS Joint-Work Program provides a host of implementation activities such as improvements to performance measurement and monitoring of the benefits and co-benefits of transportation projects and plans that ensures the implementation of the 2012 RTP/SCS.

Despite calling for reductions in greenhouse gas emissions, the SRTP does not go far enough. While the SRTP does not list the approximate number of metric tons of CO₂ for the plan, it appears there is an almost 15 percent increase from the 2014 plan to 2024 plan. This increase does not align with the 9 percent GHG reduction target by 2020 in the 2012 RTP/SCS or the commitment to engage in implementation of the plan as listed in the Metro-SCAG Joint-Work Program. Metro and L.A. County represent over 50% of the population of the SCAG Region; this SRTP will have a significant impact on whether or not the GHG targets for 2020 and 2035 are met. We ask that Metro better align the SRTP with the goals and commitments from both the 2012 RTP/SCS and the Metro-SCAG RTP/SCS Joint Work Program, specifically including better performance measures that monitor the benefits and co-benefits of this transportation plan, to ensure that the GHG reduction targets are met.

**Invest in Active Transportation, Shared Use Mobility, and Other Alternative Transportation Options**

The SRTP does not adequately invest in active transportation, shared use mobility and other alternative transportation options. L.A. County has some of the worst traffic congestion in the country, and the transportation sector is one of the largest sources of greenhouse gas emissions. We applaud Metro for investing the majority of funds in transit, which underscores California’s shift away from car-centric transportation planning. However, as noted by the increasing GHG emissions, transit investments will not completely solve L.A.’s transportation problems. We must think broader.

If we want to provide people with the flexibility of movement, L.A. County needs to develop new systems and practices that incentivize transit over cars. Expanding transit such that transportation and transit infrastructure connects homes with jobs. The First-Last Mile Strategic Plan outlines a myriad of ways that Metro and local governments can increase the safety and convenience of using transit and other non-auto modes, but the investments outlined in the SRTP do not reflect a strong commitment to implementing this plan. There is a mere $0.5 billion or approximately 0.6 percent dedicated to Active Transportation over the next ten years. As shown by the SRTP, this small amount will not reduce enough GHG emissions to preserve California for future generations. We ask that Metro invest more funds in active transportation to ensure the First-Last Mile Strategic Plan is successfully implemented.

In the SRTP, there is very little mention of ridesharing, bike sharing, car sharing and other new and emerging mobility options whose use is expected to skyrocket over the next decade. Successful bike share programs in Washington, D.C. and its replication in San Francisco and other places highlight the need to invest in these new mobility options. Without adequate investments in these alternative transportation options, Metro places a limit on their growth and continues reliance on the automobile for the majority of trips. NRDC and ClimatePlan recognize that Metro is not solely responsible for funding these transportation modes, but it does have funding authority over significant state, federal and local resources, which in turn influences what others decide to prioritize with their transportation funding. We ask that Metro better prioritize new mobility options such as rideshares, bike shares, and car share as new opportunities to reduce our reliance on cars and reduce our GHG emissions.

In closing, this plan is a “pact” with the people of L.A. County to “plan, construct and operate a world-class transportation system that meets the needs of all who live, work or play in the region.” Metro is building one of the largest transit systems in the United States, which has the potential to transform the L.A. region and improve access to jobs, affordable housing, education, healthy living and essential goods and services without the need to drive. But the Southern California region will not reach the goals outlined in the 2012 SCS/RTP if we simply hold greenhouse gas emissions at current levels. There is an increasing appetite for new mobility solutions to our traffic problems and we need to incorporate this appetite into our transportation plans.
ClimatePlan will release a tool this summer to highlight the region’s progress on SCS implementation; we hope we can showcase the SRTP as a way that regional and local agencies are working together to implement SB 375 and ultimately work towards a more sustainable future for our children.

We hope that you take these comments into consideration as your finalize the 2014 SRTP. If you have any questions, please do not hesitate to contact Amanda Eaken, Deputy Director of Sustainable Communities, at (415) 875-6100, Autumn Bernstein, Director of ClimatePlan, at (510) 740-3150 ext. 302, or Laura Baker, at (213) 223-6860.

Sincerely,

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cc: Art Leahy, CEO, Metro
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